

EX. C

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF TEXAS
4 MARSHALL DIVISION
5

6 CONVOLVE, INC.,)
7)
8 Plaintiff,)
9) Civil Action No.
10 vs.) 2:08-cv-244
11)
12 DELL INC., WESTERN DIGITAL)
13 CORPORATION, HITACHI)
14 GLOBAL STORAGE)
15 TECHNOLOGIES, INC., and)
16 HITACHI LTD.,)
17 Defendants.)
18 _____)
19)
20)
21)
22)
23)
24)
25)

26 HIGHLY CONFIDENTIAL
27 OUTSIDE ATTORNEYS' EYES ONLY VIDEOTAPED
28 RULE 30 (b)(6) DEPOSITION OF
29 NEIL SINGER
30 Atlanta, Georgia
31 Tuesday, March 22, 2011

32 Reported by:
33 PATRICIA A. BIDONDE, RPR
34 JOB #: 37481
35

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

March 22, 2011

9:43 a.m.

Rule 30(b)(6) Confidential
Videotaped Deposition of Convolve
through its representative, Neil Singer,
held at the offices of Robins, Kaplan,
Miller & Ciresi L.L.P., 2600 One Atlanta
Plaza, Atlanta, Georgia, before Patricia
A. Bidonde, a Registered Professional
Reporter and Notary Public of the State
of New York.

1 Singer - Highly Confidential - Outside Attorneys Eyes Only
2 they are. They're from -- actually, I don't
3 know. I'd have to look at the drive.

4 Q. Okay.

5 A. You want me to do that or --

6 Q. That's fine.

7 Is it your understanding that
8 today the disk drives that Dell ships in its
9 computer systems have an internal processor?

10 A. I believe that all drives from
11 the time we were working on disk drives to the
12 present have had internal processors. I'm not
13 aware of any, except for ones in the early
14 days of computing before we worked on disk
15 drives, that didn't.

16 Q. If you were to take one of those
17 disk drives in a Dell system, and cut out the
18 internal processor, would that disk drive
19 function?

20 A. No.

21 Q. How did you get involved with the
22 T13 committee with regard to the invention of
23 the '473 patent?

24 A. I've had no involvement with the
25 T13 committee. My only interaction with them